

**REMARKS**

Claims 1-9, 13-17, 20-36 and 39-49 are pending in this application. Claims 25-36 are withdrawn from consideration. By this Amendment, claims 1, 13, 21-24, 39 and 48-49 are amended.

**I. Claims 13, 22 and 24 Satisfy the Requirements of 35 U.S.C. §112, First Paragraph**

Claims 13, 22 and 24 are rejected under 35 U.S.C. §112, first paragraph as failing to comply with the written description requirement. Applicants respectfully disagree with the Examiner's assertions.

As shown in Figure 13, depressions 128 are shown to be formed on at least the upper layer 122 of the insulating layer 120. Further, as discussed at least on page 38 of the specification, on the insulating layer 120 in the region avoiding electrodes 112, a plurality of depressions 128 are formed. The depressions 128 may be formed to communicate with the upper layer 122 and lower layer 124. Further, Figure 15 discloses depressions formed only in an uppermost layer 162.

Accordingly, withdrawal of the rejection of claims 13, 22 and 24 under 35 U.S.C. §112, first paragraph is respectfully requested.

**II. The Claims Define Patentable Subject Matter**

Claims 1-9, 13-17, 21-24 and 39-49 are rejected under 35 U.S.C. §103(a) as unpatentable over U.S. Patent No. 6,075,290 to Schaefer et al. in view of U.S. Patent No. 6,441,487 to Elenius et al. This rejection is respectfully traversed.

The applied art does not teach, disclose or suggest a plurality of insulating layers formed around the external terminals, the insulating layers formed on the interconnect pattern, as claimed in claim 1 and similarly claimed in claims 21, 23, 39, 48 and 49.

Instead, each of Schaefer and Elenius discloses that the passivation film is formed under the interconnect pattern. Accordingly, the applied art does not teach, disclose or even suggest that a plurality of insulating layers are formed on the interconnect pattern.

With respect to claims 13, 22 and 24, the applied art does not disclose that the interconnect pattern is formed on the uppermost layer of the insulating layers with the uppermost layer having protrusions and depressions and wherein the external terminals are formed in the depression and the external terminals are electrically connected to the interconnect pattern in the depressions, as claimed in claim 13 and similarly claimed in claims 22 and 24.

The features discussed above are not disclosed, taught or even suggested in the applied art. The features discussed above are discussed, for example, on page 40, line 23- page 41, line 2 of the present application. That is, the electrical connection portion between the interconnect pattern 130 and the external terminals 140 is positioned on the insulating layer 120. As a result, stress applied to the electrical connection portion between the interconnect pattern 130 and the external terminals 140 is also absorbed by the insulating layer 120. The applied art does not disclose the features recited above and thus, cannot provide the advantages discussed above.

Withdrawal of the rejection of the claims under 35 U.S.C. §102 and §103 is respectfully requested.

### **III. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,



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